

IL-0237-31
Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

N.

EPA Region 5 Records Ctr.



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217/782-6760

August 5, 1981

Refer to: Will County - Joliet/Process Alliance Partnership
Permit No. 1981-1-EX-DE

RECEIVED

AUG 07 1981

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Process Alliance Partnership
608 Railroad Street
Joliet, Illinois 60436

Mr. Robert D. Barker
900 Railroad Street
Joliet, Illinois 60436

Attention: Alfred M. Tenney and
Donald E. Matschke

Gentlemen:

This will acknowledge receipt of your application for permit to develop a waste management facility dated June 16, 1981, and received by this Agency June 26, 1981.

The July 17, 1981 inspection of the facility, conducted by Sallie Smith and Lisa Binder of this Agency, with the facility operator (Chuck), and a review of the application revealed the following:

1. The "berm" on the north side of the facility is constructed of loose soil, was uncompacted, was sandy or gravelly in places, and was subject to slope failure as the facility operator and Agency personnel walked upon it. The construction of the berm cannot be considered to be an effective device for containment of liquids at the facility. Therefore, the facility is in violation of Section 12(a-b), Environmental Protection Act, as amended January 1, 1981.
2. Certain tanks are so close to the north edge of the site that they are virtually over the berm. Specifically, the 35,000 and 10,000 gallon tanks parallel the northern edge of the property, and two 35,000 gallon tanks abut the northern edge of the property. A leak or puncture of one of those tanks near the berm could and would very likely spill to the north side of the berm, and therefore, would not be contained on the facility. Thus, the Agency cannot be assured that the construction or operation of the facility will not cause or tend to cause a violation of the Environmental Protection Act, Sections 12(a,b) and 21(a).
3. The berm can and will retain liquids for a very short time. If a spill of some type should occur during a rain, rainwater would become contaminated. The culvert pipe and gate provide an avenue for removal of accumulated rainwater. No provision

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Process Alliance Partnership and
Mr. Robert D. Barker

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August 5, 1981

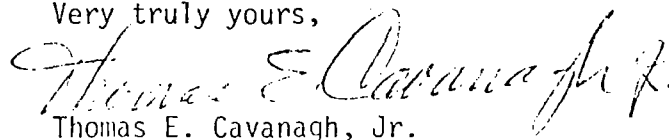
has been provided at the site or shown on plan sheets to prevent spills from entering city property south of the Process Alliance Partnership property. This would be a violation of the Act, Sections 12(a, b) and 21(b).

4. During the inspection, the site operator informed Agency personnel that during heavy rains in June, 1981, rainwater in the area accumulated behind the retaining wall at the river until it flowed over the wall and into the river. Water in the office at the facility was about four feet deep. Should a leak, spill or accident involving special waste occur during a rainstorm or be caused by heavy rains, the facility would then be in violation of the Environmental Protection Act, Section 12(a, b).
5. When asked about the alleged spill by P.A.P. to the U. S. Army Corps of Engineers property, the site operator stated that a tank was temporarily stored near the Corps' property line. Development and Operating Permits have not been obtained for the vacant property south of P.A.P. which is, in fact, a vacated City street. The tank leaked, and upon arrival at P.A.P. the next work day, facility personnel cleaned up the spill. Nothing in any application states that the property south of the P.A.P. facility has been purchased from the City or authorized by the City for use by P.A.P. This area is not mentioned in any application and is not referenced in Permit No. 1981-1-EX-DE dated January 9, 1981, or renewal dated March 30, 1981. (Rules 201, 202, of Chapter 7 of the Illinois Pollution Control Board Rules and Regulations; Section 21(b and d), Environmental Protection Act.)

Based on the above, the Agency must deny the permit.

As an aside, and not as part of the above permit denial, the Agency takes this opportunity to remind the site owner/operator that all permits necessary to bring the site into full compliance with the Illinois Environmental Protection Act and Rules and Regulations adopted thereunder must be obtained by October 1, 1981. See the permit extension letter effective March 30, 1981, with attached cover letter dated March 26, 1981, mailed to your facility by the Agency. If the subject site has not obtained all necessary IEPA permits by October 1, 1981, the Agency expects any and all illegal unpermitted activity to cease.

Very truly yours,



Thomas E. Cavanagh, Jr.
Manager, Residual Management Section
Division of Land Pollution Control

SAS:bkm

cc: Permit Section, DWPC
Permit Section, DAPC
Special Waste Unit
Northern Region Land-FOS ✓
Enforcement-LPC